

March 29, 2017

VIA ECF

Hon. Richard M. Berman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Donato v. Gemini Diner, et al. Docket No.: 16-6207

Your Honor:

This firm represents the Defendants in the above referenced matter. This letter is being filed with the consent of Plaintiff's counsel herein.

The parties write today to request an adjournment of the settlement conference before Your Honor scheduled for April 3, 2017. The Court granted a previous adjournment request from March 20, 2017 to the present April 3rd date. We would request that the Court set a new settlement conference date of May 1, 2017 or a date most suitable to the Court. The parties are still engaged in meaningful discussions regarding settlement and would like to continue same before requesting the Court's time to assist in settlement.

In light of this adjournment request, which is also an adjustment to the Court's Case Management Plan, we also write to respectfully request an extension of time for discovery as well and propose May 1, 2017 for same. We have not yet had the opportunity to complete discovery and would expect that such completion would be beneficial in furtherance of settlement as well as in preparation of the case for further proceedings, if settlement should prove unsuccessful.

With regard to discovery, specifically, we are attempting to avoid the accrual of unnecessary legal fees and expenses. Accordingly, we respectfully request and appreciate the Court's assistance in allowing us to extend the discovery deadline so settlement efforts can continue in earnest.

Thank you for the Court's time and attention to this matter.

Respectfully submitted,

Law Office of A. Koutsoudakis, PLLC

By: /s/ Andreas Koutsoudakis
ANDREAS KOUTSOUDAKIS, ESQ. (AK4162)

Cc: All parties (via ECF)